

EXHIBIT 106

INTENTIONALLY
OMITTED

EXHIBIT 107

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
3 Case No. 11 Civ. 0691 (LAK)

-----x
4 CHEVRON CORPORATION,
5 Plaintiff,
6 - against -
7 STEVEN DONZIGER, et al.,
8 Defendants.
9 -----x

10 November 5, 2018
10:22 a.m.

11
12
13 DEPOSITION of CLIFF EISLER, held at
14 the offices of Gibson, Dunn & Crutcher LLP,
15 located at 200 Park Avenue, New York, New
16 York 10166, before Anthony Giarro, a
17 Registered Professional Reporter and a
18 Notary Public of the State of New York.
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25

1 CLIFF EISLER

2 And it says, "The proceeds of the
3 funder's investment shall be used to fund
4 litigation and other expenses, dedicated
5 to securing collection of the Ecuador
6 judgment in Canada and other
7 jurisdictions as may be determined."

8 A Yes.

9 Q Who decided how funds could
10 be spent?

11 MR. DONZIGER: Objection.
12 Please phrase the question and lay a
13 foundation properly.

14 A I'm not sure.

15 Q What was your understanding
16 of what the money would be used for?

17 A For Alan Lenczner's
18 litigation expenses.

19 Q Anything else?

20 A No, not that I'm aware of.

21 Q Was it your understanding
22 that the proceeds would be used -- would
23 be paid to Mr. Donziger?

24 A No.

25 Q How about to any other

1 CLIFF EISLER

2 lawyers besides Mr. Lenczner?

3 A My understanding is it was
4 paid to Alan Lenczner's law firm. That's
5 all I know.

6 Q Were you ever shown any
7 accounting of how the money you invested
8 was spent?

9 A No.

10 Q Was it your understanding
11 that it could be used for so-called
12 pressure tactics against Chevron?

13 You look confused.

14 Did you ever hear Mr.
15 Donziger talk about pressuring Chevron?

16 A Do you mean like just
17 through PR?

18 Q Yes, whatever.

19 Did you ever hear him talk
20 about that?

21 A Yes. I did hear him talk
22 about that but not necessarily using
23 these funds to do that.

24 Q What was your understanding
25 of how he wanted to or did pressure

1 CLIFF EISLER

2 Chevron?

3 A I think it's almost solely
4 just in terms of press releases.

5 Q Okay.

6 Was it your understanding
7 that these funds could be used for that
8 purpose?

9 MR. FERGUSON: Objection.

10 A No.

11 Q What was your understanding
12 of who wrote the press releases?

13 MR. FERGUSON: Objection.

14 Which press release?

15 MS. CHAMPION: The ones he's
16 referring to.

17 MR. FERGUSON: That would
18 assume that they're all written by
19 the same person.

20 MS. CHAMPION: No, it
21 doesn't.

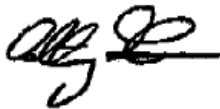
22 Q What was your understanding
23 of who wrote the press releases?

24 A I believe Steven has a PR
25 person.

C E R T I F I C A T I O N

I, ANTHONY GIARRO, a Shorthand
Reporter and a Notary Public, do hereby
certify that the foregoing witness, CLIFF
EISLER, was duly sworn on the date
indicated, and that the foregoing, to the
best of my ability, is a true and accurate
transcription of my stenographic notes.

I further certify that I am not
employed by nor related to any party to
this action.



ANTHONY GIARRO

EXHIBIT 108

Joshua Rizack

From: Steven Donziger <sdonziger@donzigerandassociates.com>
Sent: Wednesday, August 02, 2017 6:53 AM
To: Aaron Marr Page
Cc: Joshua Rizack
Subject: Re: immediate assistance

We need to nail this down. Been too long.

Sent from my iPhone

On Aug 2, 2017, at 12:11 PM, Aaron Marr Page <aaron@forumnobis.org> wrote:

The basic answer is the Trust, making the FDA the sole beneficiary of the judgment. But we've never had the trust document translated.

I feel like we got you a letter in recent times from the FDA (or UDAPT, back on that old trip) expressly authorizing you to do fundraising etc.? I guess that must have been UDAPT. I am not sure the latest status re FDA. This is in your draft contract so maybe the answer is to get that signed ASAP.

From: Steven Donziger [<mailto:sdonziger@donzigerandassociates.com>]
Sent: Wednesday, August 2, 2017 4:25 AM
To: Joshua Rizack <jrizack@therisinggroup.com>; Aaron Marr Page <aaron@forumnobis.org>
Subject: immediate assistance

If a potential investor asks for a document proving the authority of the FDA to enter into deals, and my authority from the FDA to negotiate deals, what do we have to give them? I've got someone hot on our tail who is asking for this. Please respond as soon as u can. Thanks.

Aaron, we need to do a deep dive into my authority from the FDA. Analyze where it is now, and what we need to do to clarify/expand it at this juncture. Thanks.

EXHIBIT 109

I6SJCHE1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

-----x

3 CHEVRON CORPORATION,

4 Plaintiff,

5 v.

11 Civ. 691 LAK JCF

6 STEVEN DONZIGER, et al.,

7 Defendants.

8 -----x

9 June 28, 2018
10 9:30 a.m.

11
12 Before:

13 HON. LEWIS A. KAPLAN,

14 District Judge

15 APPEARANCES

16 GIBSON, DUNN & CRUTCHER, LLP

17 Attorneys for plaintiff

18 BY: RANDY M. MASTRO, Esq.

19 HERBERT J. STERN, Esq.

20 JOEL SILVERSTEIN, Esq.

21 ANDREA NEUMAN, Esq.

22 ANNE MARIE CHAMPION, Esq.

23 ALEJANDRO HERRERA, Esq.

24 JEFFERSON BELL, Esq.

25 STEVEN ROBERT DONZIGER,

Appearing pro se

Also Present:

ANDREW R. ROMERO-DELMASTRO, Supv. Counsel Chevron

I6SJCHE3

1 arranging any more financing, and I can't until I get clarity,
2 some sort of clarification from your Honor what is, in your
3 view, permissible or not permissible. I want to be clear about
4 that because --

5 THE COURT: Look, I appreciate that, but you seriously
6 need to consider whether, even if you are right as to what
7 happened in days of yore, whatever that argument has any
8 traction at all from the minute the judgment was entered
9 against all your clients, including the Frente, which I won't
10 prejudge it, but it certainly is a different set of facts. I
11 am not going to give you a declaratory judgment.

12 MR. DONZIGER: On that point, you're referring to the
13 default judgment?

14 THE COURT: Yes, sure.

15 MR. DONZIGER: Just to be clear, I testified in my
16 deposition that I thought that it did not change the landscape
17 in terms of fund raising. I, upon further reflection, realized
18 that that is a mistake and not my position. I didn't quite
19 understand the situation when I said that. To the extent you
20 read my deposition or they raise it, I want to be clear about
21 that.

22 THE COURT: I am nodding not to evidence agreement,
23 but to acknowledge the fact you have said something.

24 MR. DONZIGER: Thank you.

25 THE COURT: I think everybody will have to think about

EXHIBIT 110

From: Steven Donziger <sdonziger@donzigerandassociates.com> on behalf of Steven Donziger
Sent: Thursday, April 26, 2018 6:39 PM
To: John van Merkensteijn
Subject: Fw: Reference from Ian Watson

Categories: -

FYI

hope u are well

From: Steven Donziger
Sent: Thursday, April 26, 2018 2:37 PM
To: don.johnson@bmo.com
Cc: Ian Watson
Subject: Reference from Ian Watson

Mr. Johnson,

Ian Watson suggested I contact you regarding a potential investment opportunity related to a large environmental judgment (\$12b U.S.) current being enforced against Chevron in Canadian courts. I would be honored to have the opportunity to explain more. The two links below will give you a sense of some recent developments.

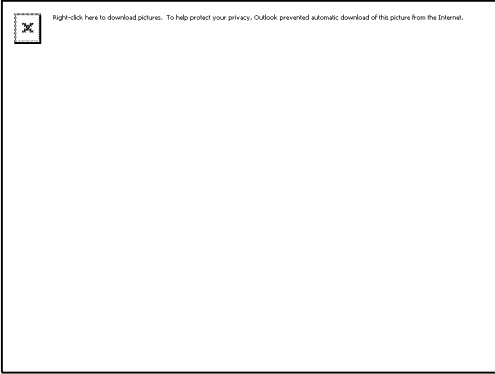
If interested, please indicate a time to connect via telephone. I am in Toronto on a regular basis so we could meet in person if preferred.

Best,

Steven Donziger

Here are the links:

http://www.csrwire.com/press_releases/40957-In-Canada-Chevron-Faced-Tough-Questions-During-Critical-Court-Hearing-Over-12b-Ecuador-Pollution-Judgment

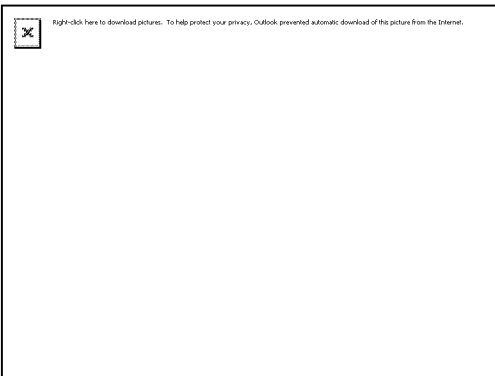


In Canada, Chevron Faced Tough Questions During Critical ...

www.csrwire.com

TORONTO, Apr. 20 /CSRwire/ - Chevron faced a series of tough questions from a three-judge appellate panel this week in Ontario over its continued attempt to evade paying a \$12 billion environmental liability owed to Indigenous peoples and farmer communities in Ecuador's Amazon region following the ...

<http://business.financialpost.com/legal-post/meet-alan-lenczner-the-man-fighting-for-ecuadoran-villagers-in-their-canadian-case-against-chevron>



Meet Alan Lenczner: The man fighting for Ecuadorian ...

business.financialpost.com

Meet Alan Lenczner: The man fighting for Ecuadorian villagers in their Canadian case against Chevron Lenczner, one of Canada's top litigators, agreed to take the case after he made a trip to Ecuador and saw the damage left behind by nearly two decades of pollution

EXHIBIT 111

From: John van Merkensteijn <jhvm@rossteq.com>
Sent: Friday, May 11, 2018 4:40 PM
To: Steven Donziger
Subject: FW: Greenpeace /Chevron article

A quick no

John H. van Merkensteijn III
Phone (212) 769-4055
jhvm@rossteq.com

From: Josh Mailman <joshuamailman1@gmail.com>
Date: Friday, May 11, 2018 at 12:39 PM
To: John van Merkensteijn <jhvm@rossteq.com>
Subject: Re: Greenpeace /Chevron article

Hi John ,
Thanks but I am not going to get involved in the Canadian litigation so I think a visit with that as the objective doesn't make sense .
Best , Josh Mailman

On Fri, May 11, 2018 at 12:36 PM John van Merkensteijn <jhvm@rossteq.com> wrote:

Bill/Lynne/Josh/Steven

Attached is the fantastic article by Rex Weyler summarizing the actions by Chevron in the
Litigation over the years.

It reminded me that some time ago we intended to bring Josh up to date on the litigation in Canada.

Josh if you are interested, maybe this would be an opportune time to get together with Steven. Would you be available for a lunch or a visit in the near future.

All the best

John H. van Merkensteijn III

Phone (212) 769-4055

jhvm@rossteq.com

EXHIBIT 112

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 C.A. No. 11 Civ. 0691 (LAK)

5 -----x
6 CHEVRON CORPORATION,

7 Plaintiff,

8
9 - against -

10 STEVEN DONZIGER, et al.,

11 Defendants.

12 -----x

13 June 25, 2018

14 10:07 a.m.

15 Videotaped Deposition of STEVEN
16 DONZIGER, taken by Plaintiff, pursuant to
17 Order, held at the offices of Gibson Dunn &
18 Crutcher LLP, 200 Park Avenue, New York,
19 New York, before Todd DeSimone, a
20 Registered Professional Reporter and Notary
21 Public of the State of New York.
22
23
24
25

DONZIGER

consider your subpoena to me to be overbroad and unduly burdensome. And I'm also a sole practitioner with limited time and limited technical capacity to effectuate the kind of search that, say, Chevron would do or you guys would do at Gibson Dunn on behalf of Chevron.

So taking that into account, I did a fair amount of searching and document gathering and I have more documents that you are seeking that I don't believe is appropriate to turn over at this point given the sort of outstanding legal issues that need to be resolved by the Court.

Q. And what's the volume of documents that you are withholding?

A. Well, it is a few hundred pages, but if Judge Kaplan were to order me to produce everything that you are asking for, it obviously would be a lot more than that.

Q. And so what is the difference between the "a lot more" and the few hundred pages? Because I'm not sure I'm

1 DONZIGER

2 following your train of thought.

3 A. The difference is I have not
4 searched for documents responsive to every
5 request in your subpoena. I mean, some of
6 them, in my personal opinion, would be
7 impossible to do.

8 So what I thought was most
9 reasonable, even though I believe this
10 stuff is privileged or for whatever reason
11 is intrusive and in violation of my
12 constitutional rights, I have gathered more
13 documents. If Judge Kaplan were to order
14 me to produce them, subject to my rights
15 and whatever other recourse I would have,
16 obviously I would be able to do that.

17 Q. So these documents that you
18 searched for, found and are withholding on
19 the basis of privilege, you have not
20 provided a privilege log for those
21 documents, correct?

22 A. That's correct.

23 Q. And you haven't produced them
24 under the 502 we agreed to; is that
25 correct?

CERTIFICATION

I, TODD DeSIMONE, a Notary Public for
and within the State of New York, do hereby
certify:

That the witness whose testimony as
herein set forth, was duly sworn by me; and
that the within transcript is a true record
of the testimony given by said witness.

I further certify that I am not related
to any of the parties to this action by
blood or marriage, and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 26th day of June, 2018.



TODD DESIMONE

* * *

EXHIBIT 113

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Case No. 11 Civ. 0691 (LAK)

-----x

CHEVRON CORPORATION,
Plaintiff,
- against -
STEVEN DONZIGER, et al.,
Defendants.

-----x

October 5, 2018
1:19 p.m.

CONTINUED DEPOSITION of JOSH RIZACK,
held at the offices of Gibson, Dunn &
Crutcher LLP, located at 200 Park Avenue,
New York, New York 10166, before Anthony
Giarro, a Registered Professional Reporter
and a Notary Public of the State of New
York.

1 JOSH RIZACK

2 Q You don't recall, one way or
3 the other?

4 A Right. It's possible.

5 Q If you had done any work in
6 2017, would you have prepared an invoice?

7 A If it was substantial work.
8 But I don't recall doing substantial work
9 since the RICO matter.

10 Q Since March of 2014?

11 A Yeah, I mean besides what we
12 discussed in the last deposition.

13 Q And do you recall issuing
14 any invoices since March of 2014 in
15 connection with the Chevron-Ecuador
16 matter?

17 A I don't recall.

18 Q When you say "substantial,"
19 what do you mean?

20 A You know, where I spent
21 hours and hours, you know, hours on end,
22 you know, days.

23 Q Can you be more specific
24 than hours on end? More than five hours?

25 A Yeah, more than five hours.

1 JOSH RIZACK

2 Or I spent days, you know.

3 Q So is it accurate to say
4 that you have not done any substantial
5 work on the Chevron-Ecuador matter since
6 March of 2014?

7 A Except what we discussed in
8 the last deposition.

9 Q So you said that what you
10 did, post-RICO, that we discussed in the
11 last deposition was minor?

12 A Yeah.

13 Q Are you now saying it was
14 substantial?

15 A No. To me, it was minor.
16 Steve would call up, hey, you know, if an
17 investor does this, you know, and I'd
18 make him these charts over and over
19 again; you know, he would call me for
20 little things like that, you know. And I
21 produced those charts and so forth. And
22 we had -- you know, Katie came and picked
23 up boxes. Him and Katie came and picked
24 up boxes of files I had. And then I
25 think I had -- I think I had a couple of

1 JOSH RIZACK

2 e-mail exchanges with Katie. And I might
3 have had a call with her, a brief call
4 about some questions she had on some of
5 the stuff in the boxes or a spreadsheet
6 or something.

7 Q Could you estimate in terms
8 of hours the amount of time you spent
9 working on the Ecuador matter, doing
10 anything since March of 2014?

11 A No. I mean it would just be
12 like a totally, random, useless guess. I
13 really don't remember how many hours I
14 would have spent on it.

15 Q Would it be less than ten?

16 A I don't know, honestly.

17 Q Would it be more than 100?

18 A Yeah. It would not be 100,
19 no. It would be substantially less than
20 100.

21 Q Would it be less than 50?

22 A I'm just guessing. I don't
23 remember.

24 Q Is it accurate to say that
25 since March of 2014, you've spent

1 JOSH RIZACK

2 somewhere between 10 and 100 hours on the
3 Ecuador matter?

4 A Sure. That's reasonable.

5 Q And you have not invoiced
6 for any of those hours?

7 A I don't believe I did.

8 Q If you're not spending
9 significant time working on the Ecuador
10 matter, the calls that you had with
11 Mr. Donziger on a monthly basis, are
12 those personal or professional?

13 A Personal. Or I might ask
14 what's going on with the case, what's
15 going on up in Canada, you know, what's
16 going on in general, personal also,
17 what's going on with your son, how are
18 your kids.

19 THE VIDEOGRAPHER: We're now
20 off the record at approximately
21 1:57 p.m.

22 (A short recess was taken.)

23 THE VIDEOGRAPHER: We're
24 back on the record at approximately
25 two o'clock.

1 JOSH RIZACK

2 provided to him or something Mr. Donziger
3 provided or someone else?

4 A I don't recall. I'm sure
5 one of us gave him -- gave him the
6 information, Steven or I.

7 Q And then what happened?

8 A Then probably had phone
9 calls and discussed it with him and then
10 put money in.

11 Q And you participated in
12 these phone calls?

13 A I believe -- I definitely --
14 some of the calls, I did.

15 Q And the topics of the calls
16 was encouraging him to invest in the
17 Ecuador judgment?

18 A Yes.

19 Q And after these calls with
20 you and Mr. Donziger during which he was
21 encouraged to invest, Michael of Wellbeck
22 ultimately invested; correct?

23 A Correct.

24 Q And did you get any
25 compensation in connection with Michael

1 JOSH RIZACK

2 of Wellbeck's investment?

3 A I received around that
4 period when they were -- when they were
5 raising money, I received \$10,000 for --
6 you know, just in general for the work
7 that I was helping him with and putting
8 stuff together and so forth.

9 So I don't know that it was
10 tied to this or, you know, it was just
11 being paid because quite frankly, they
12 owed me money from prior. I was doing
13 these little things for Steven that I
14 mentioned before.

15 Q The \$10,000 payment that you
16 received, did that come out of the
17 investor funds, as far as you know?

18 A No. You mean out of that
19 person's funds?

20 Q Out of moneys that were
21 being raised.

22 A Oh. I'm sure it came from
23 moneys that were being raised at the
24 time.

25 Q During the discussions that

1 JOSH RIZACK

2 Q But they were being
3 discussed as you understood it?

4 A Yes.

5 (The above-referred-to
6 document was marked as Plaintiff's
7 Exhibit 5350 for identification, as
8 of this date.)

9 Q I'm going to mark as
10 Plaintiff's Exhibit 5350, a document
11 bearing the Bates number Rizack PJD521
12 through 522, the Spanish original and an
13 English translation, and the last page is
14 the related metadata.

15 A Okay.

16 Q Have you seen Exhibit 5350
17 before, Mr. Rizack?

18 A Yeah.

19 Q And it appears to be a
20 modified version of 5349; is that
21 accurate?

22 A Correct.

23 Q So in addition to the people
24 who were listed on 5349, 5350 adds Aaron
25 Page yourself and a Eva. Do you see

1 JOSH RIZACK

2 that?

3 A I see Aaron, I see Josh.

4 Q Then on the next page,
5 there's an Eva.

6 A Okay.

7 Q Whereas on 5349, there's no
8 Eva.

9 A Okay.

10 Q Were you involved in making
11 the additions of those persons to
12 Exhibit 5350?

13 A If I did, Steven would have
14 said -- you know, wrote it on a piece of
15 paper and asked me to type it in.

16 Q So under Mr. Page's name, it
17 says, "Aaron has worked over 100 years as
18 an attorney in this case, mostly without
19 pay." Do you see that?

20 A I do.

21 Q Is that a statement that you
22 wrote or one that Mr. Donziger wrote?

23 A I assume Mr. Donziger wrote
24 it. But he looks good for over 100.

25 Q Did you verify the accuracy

1 JOSH RIZACK

2 of any of the statements on 5350?

3 A No.

4 Q Do you know how much
5 Mr. Page has, in fact, been paid during
6 the course of the Ecuador case?

7 A No.

8 Q In the meeting, to the
9 extent you could understand what the
10 people present were being told, were they
11 being told that Mr. Page had worked
12 without pay?

13 A I don't recall.

14 Q Next under your name, it
15 says, "Josh helps with fundraising." Is
16 that accurate?

17 A Yes, to the extent that, you
18 know -- well, this was -- to the extent
19 that I did attend meetings with Israel, I
20 think that's -- you know, those are the
21 meetings that I did fundraising. And
22 also, I would help with, you know,
23 putting charts and -- you know, as I
24 mentioned prior.

25 Q It goes on to say, "He has

1 JOSH RIZACK

2 worked four to five years, mostly without
3 pay." Is that accurate?

4 A Correct.

5 Q "Organizing points,
6 contracts, expenses and revenues." What
7 does points refer to?

8 A I don't know. Oh, points,
9 he must mean charts with how much points
10 people got.

11 Q The percentage interest?

12 A Correct.

13 Q In the judgment?

14 A Correct.

15 Q It says, "He is an expert in
16 financing." Is that accurate?

17 A I don't know. What's an
18 expert?

19 Q Do you consider yourself to
20 be an expert in finance?

21 A In financing? In
22 financing -- financing what? I guess I'd
23 be an expert in doing DIP loans for
24 bankruptcies. That's financing. I think
25 it's a very general term and a very loose

1 JOSH RIZACK

2 term he was using. I don't think it
3 meant to be specific. I think he was
4 trying to give an understanding to the
5 group, what people did on the case.

6 Q In the next sentence, it
7 says, "In the future, he will be key in
8 organizing investments and attracting
9 more funds." Do you see that?

10 A I do.

11 Q Is that an accurate
12 statement at the time of this document?

13 A I've only brought that one
14 person to a case. I've gone and helped
15 them. But I have not gone out and
16 solicited and, you know, solicited people
17 for the case, if that's what you mean.

18 Q Well, in September of
19 2016 --

20 A Right.

21 Q -- when this document was
22 created --

23 A Right.

24 Q -- had you agreed with
25 Mr. Donziger that in the future, you

1 JOSH RIZACK

2 would be key in organizing investments
3 and attracting more funds?

4 A I probably agreed that I
5 would help them prepare, you know,
6 information, you know, interest, percents
7 and so forth in the case and would help
8 them in any way they needed help. I
9 don't think I ever said I'm going to go
10 out and find investors, like I don't have
11 a group of investors that, you know, I
12 have. I don't have a Rolodex of
13 investors.

14 My experience has been
15 raising money from or getting loans from
16 major financial institutions. And
17 certainly, that wasn't something I would
18 bring -- my dealings are with CIT and
19 Bank of America, you know, with debtor
20 loans, so no.

21 Q And those aren't entities to
22 which you would take this investment?

23 A No.

24 Q Why not?

25 A Because the people I know

1 JOSH RIZACK

2 and deal with, and as you know in banks,
3 you know, everybody -- you know the
4 person who does debtor-in-possession --
5 you know what a debtor-in-possession loan
6 is? The person who does a
7 debtor-in-possession loan doesn't do
8 mortgages. And certainly, banks don't
9 invest in legal cases, at least not to
10 my -- I didn't deal with people who
11 dealt with that.

12 Q So I need to get a little
13 more specific because you tend to say
14 probably or maybe, and I need sort of
15 yeses or nos.

16 A Okay.

17 Q In or around September of
18 2016, had you agreed with Mr. Donziger
19 that you would play a key role in
20 organizing investments and attracting
21 more funds?

22 A I'd say no.

23 Q Do you know why he would
24 represent to someone to whom he was
25 recommending you'd be given a percentage

1 JOSH RIZACK

2 interest in the judgment, that in the
3 future, you would be key in organizing
4 investments and attracting more funds?

5 A I think the way he used
6 those terms was that I would help them
7 organize information and organize putting
8 stuff together to help them figure out,
9 you know, what percentage of the case an
10 investor would get and so forth.

11 But I never -- and I think
12 he was just -- I don't think he spent a
13 lot of time -- this isn't a contract.
14 This is not an agreement. I think he
15 was, you know, quickly writing out what
16 he felt people did in the case.

17 Q Under Mr. Salazar, it says,
18 "He has already worked 18 months without
19 any pay."

20 Do you know whether or not
21 that statement was true as of
22 September 2016?

23 A No.

24 Q No, it wasn't true or no,
25 you don't know?

1 JOSH RIZACK

2 sufficient funds to pay me.

3 Q And is that the same time
4 when you stopped doing significant work
5 on the matter?

6 A When was the RICO? When did
7 the RICO trial start?

8 Q March of 2012.

9 A Yes.

10 Q So how long prior to that
11 did you stop doing significant work on
12 the matter?

13 A I don't recall.

14 Q Can you give an estimate?

15 A I don't really remember when
16 I stopped. But I know that the months
17 before the RICO, Steven wasn't really
18 around much; you know, he was deep into
19 the case. So, you know, I always got my
20 direction from him. I don't think I was
21 dealing with until -- I don't know -- you
22 know, in the months before or leading up
23 to.

24 Q So in the months leading up
25 to the trial and then during the trial --

1 JOSH RIZACK

2 A Right.

3 Q -- you were not working on
4 the matter?

5 A I really don't remember. I
6 mean that was six years ago, seven years
7 ago. It was a while. So I really don't
8 remember. And, you know, I -- I, of
9 course, worked -- I had to -- I have a
10 family I need to provide for. So I had
11 to work on -- I worked on other cases,
12 you know.

13 Q So on Exhibit 5351, it shows
14 charges of 15,000 plus per month every
15 month in 2012. Do you see that?

16 A Right.

17 Q And would that be a flat
18 15,000 plus expenses?

19 A Probably, yes.

20 Q Did you have to work some
21 minimum number of hours to get the 15,000
22 or was it just a flat fee you got every
23 month regardless?

24 A It was a flat fee.

25 Q And at your last deposition,

1 JOSH RIZACK

2 A You're asking if there's any
3 documents?

4 Q Yes, sir.

5 A I thought there was. Like I
6 said, I stopped invoicing at times
7 because there wasn't money. And the bill
8 just kept getting bigger, and I never saw
9 that it was going to be paid down.

10 Q And once you determined that
11 you weren't going to be paid, why didn't
12 you stop working on the matter?

13 A I would help them.
14 Definitely, the workload became
15 significantly less.

16 Q So you worked less on the
17 matter, but you didn't quit altogether
18 once you determined you were not going to
19 be paid?

20 A I think once the RICO case
21 happened -- it wasn't a lot of work. It
22 was not a lot of work.

23 Q Once the RICO case took
24 place?

25 A Yeah.

1 JOSH RIZACK

2 Q And there has not been
3 significant work since then?

4 A No.

5 Q So whatever you were owed,
6 you were owed prior to the RICO trial?

7 A Yes, because, you know, I
8 didn't bill -- I didn't bill him for work
9 I did after the RICO.

10 (The above-referred-to
11 document was marked as Plaintiff's
12 Exhibit 5352 for identification, as
13 of this date.)

14 Q I'm going to mark as
15 Plaintiff's Exhibit 5352, a document
16 bearing the Bates number TD Bank 365.

17 Do you see the front and
18 back of the copy of the check?

19 A Yes.

20 Q It says "Steven Donziger,
21 October 26th, 2016, Check No. 308, made
22 out to Josh Rizack for \$12,566.33." Do
23 you see that?

24 A I do.

25 Q Does that refresh your

1 JOSH RIZACK

2 recollection that Mr. Donziger paid you
3 \$12,566.33 in October of 2016?

4 A Yeah. And I think that's
5 the 10,000 I was referring to. And that
6 must have been expenses related to
7 something.

8 Q In the memo section, it says
9 "fee, fundraising, trip expenses." Do
10 you see that?

11 A Fee, fundraising: Trip
12 expenses.

13 Q Is that an accurate
14 description of what the moneys were for?

15 A You know, it was -- you
16 know, it was -- he gave me -- I don't
17 know that it was, per se, for
18 fundraising. I was helping them out, you
19 know, with these charts and so forth.
20 And, you know, I would always say to
21 Steven, you know, if you're raising
22 money, like give me something, you know,
23 give me some money. And that's -- you
24 know, was it for past due or was it for
25 current helping? I don't know. But it

1 JOSH RIZACK

2 was a payment received.

3 Q But when he gave you a check
4 in which he wrote in the memo section,
5 fee fundraising, this was after you had
6 successfully brought in an investor for
7 the judgment; correct?

8 A Yes. And that gave me
9 leverage to say, hey, give me some money
10 for, you know, the work I've been doing.

11 Q Or give me some money
12 because I brought in an investor; right?

13 A Well, yes. You know, hey, I
14 brought in an investor, let me get paid,
15 you know, for work I've done. So was it,
16 per se, because I brought in the investor
17 or because I brought an investor, I
18 finally was getting money for work I was
19 doing, you know.

20 Q And you were, at the time
21 you received this \$12,000 check, fully
22 aware of the RICO judgment; correct?

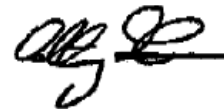
23 A Yes.

24 (The above-referred-to
25 document was marked as Plaintiff's

C E R T I F I C A T I O N

I, ANTHONY GIARRO, a Shorthand
Reporter and a Notary Public, do hereby
certify that the foregoing witness, JOSH
RIZACK, was duly sworn on the date
indicated, and that the foregoing, to the
best of my ability, is a true and accurate
transcription of my stenographic notes.

I further certify that I am not
employed by nor related to any party to
this action.



ANTHONY GIARRO

EXHIBIT 114

Travel Timeline for Steven Donziger

11-07-18

Travel Timeline for Steven Donziger

10.2015 - 03.2016

○ October 1 - 2, 2015

 Brussels, Belgium

Steven Donziger ("Donziger") visits Brussels with Josh Rizack ("Rizack") to raise funds.

 [2018.06.26 Rizack Dep. Tr. at 110:7-11; JoshRizack_5341](#)

○ February 19 - 20, 2016

 Orlando, Florida

Donziger emails Cliff and Ben Eisler, "i'm in orlando for a couple of days, back saturday." He rents a car and purchases a return ticket on Delta Airlines.

 [CE 004677; AMEX001803-17](#)

○ March 10, 2016

 Texas

In a February 23, 2016 email to Ben and Cliff Eisler, Donziger proposes a meeting on this date with Zoe Littlepage and Rainey Booth. He also proposes a dinner with Craig Smyser "either Tues or Wed[.]"

 [CE 003381](#)

Oct. 2015

Feb. 2016

Mar. 2016

○ February 5 - 6, 2016

 Toronto, Canada

On February 5, 2016, Donziger tells Cliff Eisler in an email that he is in Toronto and will be "back tomorrow[.]"

 [CE 004123-26](#)

○ March 2 - 4, 2016

 Seattle, Washington & Denver, Colorado

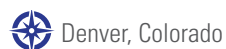
Donziger and Cliff Eisler meet with Rick Friedman and Michael White of Friedman Rubin PLLP in Seattle. They then fly to Denver, Colorado to meet with John Campbell of Campbell Law and his wife "who is also a plaintiff's lawyer and very impressive in her own right[.]"

 [CE 005573-95; CE 005565-66](#)

Travel Timeline for Steven Donziger

04.2016 - 06.2016

○ April 14 - 15, 2016



Donziger replies to an email from Ben Eisler and cc's Cliff Eisler, "hanging out in Denver. never has a man traveled such a distance for one meal." The following week, Timothy Grochocinski, an attorney with Nelson Bumgardner, P.C., emails Donziger and cc's John Campbell, "was great meeting you last week. Thanks for dinner and the sweetbreads. Let me know your thoughts on moving forward and how I can assist. Looking forward to working with you on this project." Donziger replies, "dinner was a blast" and forwards the exchange to Cliff Eisler with the comments "meant to copy you on this -- this is the IP guy in Denver that i had dinner with[.]" Donziger stays at Hotel Teatro in Denver and flies with United and American Airlines.

[CE 006138; CE 006211-12; AMEX001823-34; AMEX001841-58](#)

○ June 20, 2016



Donziger, Ben Eisler and Cliff Eisler meet with Ben Barnes in Washington, DC at Barnes' office and then have dinner at Westend Bistro in The Ritz-Carlton Hotel.

[CE 006591-92](#)

Apr. 2016

May 2016

Jun. 2016

○ April 18 - 19, 2016



Donziger responds to an email from Ben and Cliff Eisler, "in DC at the moment coming back on train this morning..." Donziger stays at The Fairfax at Embassy Row hotel.

[CE 006191-93; AMEX001841-58](#)

○ May 26 - 30, 2016



Donziger emails Cliff Eisler, "in Florida will revert shortly[.]" His American Express statement shows two charges at the Omni Amelia Island resort: one statement reservation begins on May 26, 2017 while the other starts on May 27, 2016. Both reservations show departures on May 30, 2016.

[CE 006441-43; AMEX001869-82](#)

Travel Timeline for Steven Donziger

08.2016 - 10.2016

○ August 19 - 29, 2016



Portugal

On August 27, 2016, John van Merkensteijn ("van Merkensteijn" or "JVM") emails Michael Ben-Jacob ("MBJ") and cc's Derek Stoldt ("Stoldt"), Bill Twist ("Twist") and Donziger writing, "I spoke to Steven [Donziger] today (he is on vacation in Greece I think) and here is where we are." Donziger's American Express statement shows a purchase at JFK Airport in New York, New York on August 19, 2016 followed by multiple purchases in Lisbon, Portugal ending on August 29, 2016.

 [JVM 004918-19; AMEX001921-36](#)

○ October 17 - 18, 2016



Boston, Massachusetts

On October 13, 2016, Donziger emails Ben and Cliff Eisler that he would like to schedule a meeting with van Merkensteijn on Monday, October 17, 2016, in the morning because he has to "drive up to Boston in the afternoon." On October 18, 2016, Donziger emails Cliff Eisler, "give me a call, driving back from Boston later this morning. Making progress."

 [CE 006963-64; CE 006971-73](#)

Aug. 2016

Sept. 2016

Oct. 2016

○ September 26, 2016



Ecuador

Donziger and Rizack visit Ecuador in September 2016. Donziger writes in an email to Cliff Eisler on September 26, 2016, "going down to Ecuador today. let me know when u [sic] can do a Donford meeting with Van Merkensteijn."

 [2018.10.05 Rizack Dep. Tr. at 263:10-13; CE 006960](#)

○ October 24, 2016



Washington, D.C.

On October 24, 2016, Donziger emails Cliff Eisler, "i am on train from DC to NYC[.]"

 [CE 007001-07](#)



Location

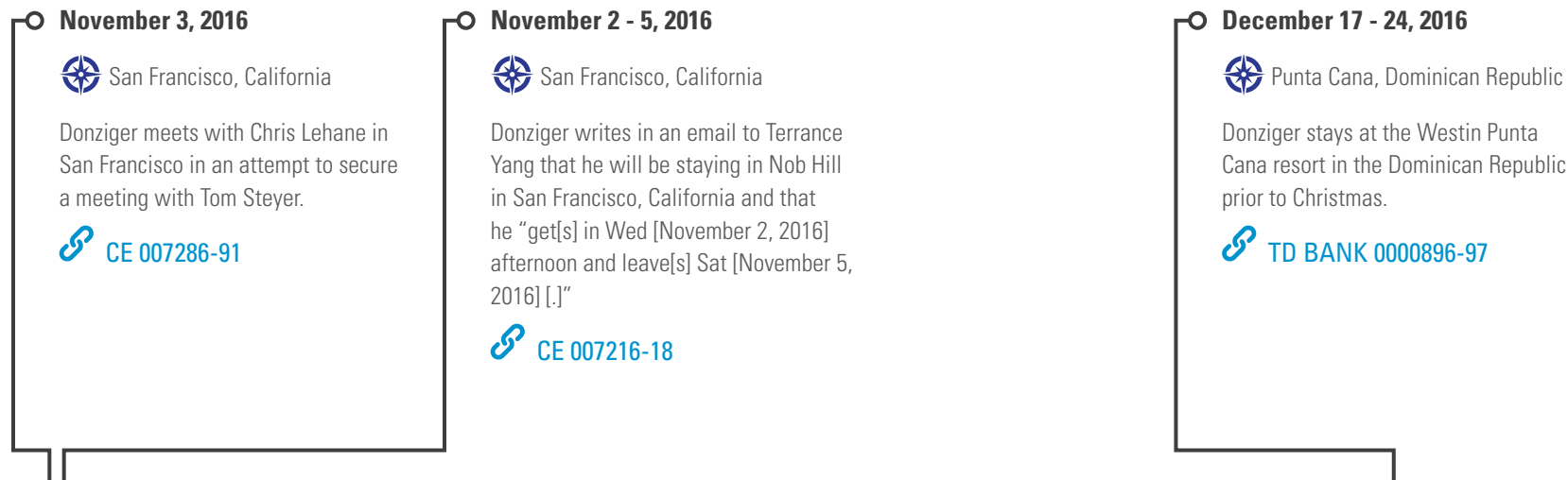


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3 of 16

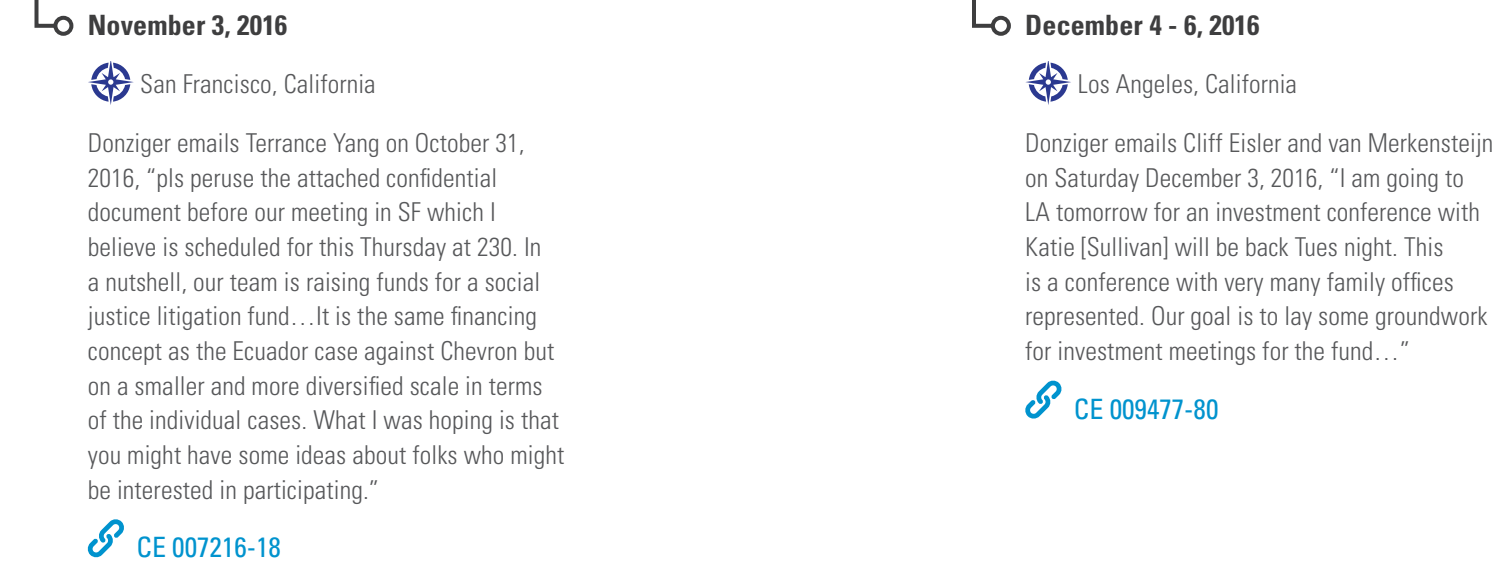
Travel Timeline for Steven Donziger

11.2016 - 12.2016



Nov. 2016

Dec. 2016



Travel Timeline for Steven Donziger

01.2017 - 03.2017

○ January 11 - 14, 2017



Donziger emails Cliff Eisler on January 8, 2017, "planning to leave on Wed night of this week for Paris but not 100% sure yet. Let's discuss how best to pitch this to the Europe guy should I go." He attaches to the email a PowerPoint presentation and memo summarizing his comments on the social justice fund. Donziger purchases dinner at Frenchie restaurant in Paris, France on January 12, 2017. On January 13, 2017, Donziger sends an email to Eisler with the subject "Daniel" and writes, "good meeting on both fronts...still very much alive[.]" He makes additional purchases in France with a final purchase at Orly Airport on January 14, 2017.

[TD BANK 0000717-20; TD BANK 0000887; CE 012790; CE 012628-62](#)

○ February 17 - 21, 2017



Donziger's TD Bank debit card statements indicate that he paid a Delta Airlines baggage fee on February 17, 2017, at LaGuardia Airport in New York. He then purchased meals and paid for hotels in Savannah, Georgia, followed by Fernandina Beach, Gainesville and then Jacksonville, Florida. His final purchase is at a kiosk at the Jacksonville Airport on February 21, 2017.

[TD BANK 0000724-25](#)

Jan. 2017

Feb. 2017

Mar. 2017

○ January 26, 2017



Donziger gives a talk at Yale Law School.

[GKrevlin_0000024](#)

○ February 6 - 10, 2017



Donziger visits Ecuador.

[LEX1000052750_CRT.pdf](#)

○ March 3 - 7, 2017



Donziger purchases in-flight wi-fi on March 3, 2017, and then dines at L'Hostaria in Aspen, Colorado. He exchanges emails with John Campbell indicating that the two are planning to meet on March 6 or 7 in Denver. He makes his final purchase in Aspen on March 6, 2017, and appears to return to New York via Chicago on March 7, 2017.

[TD BANK 0000728; TD BANK 0000854; CE 014492](#)

Travel Timeline for Steven Donziger

04.2017 - 05.2017

○ April 13 - 18, 2017

 London, United Kingdom

Donziger's TD Bank account statement shows purchases at JFK airport in New York on April 13, 2017, followed by multiple purchases in London ending on April 18, 2017. He stays at Brown's Hotel. In an April 12, 2017 email exchange with van Merkensteijn, Alan Harter of Pactolus Private Wealth Management cancels a planned April 14, 2017 meeting in New York to return to London. Van Merkensteijn replies, "Steven Donziger may be able to travel soon and be in London- later this month and perhaps you could meet him then[.]"

 [TD BANK 0000848-49; CE 015138](#)

○ May 25 - 26, 2017

 Ottawa, Canada

Prior to leaving for Canada, Katie Sullivan ("Sullivan") emails Donziger on May 23, 2017, "Hope your trip to Canada is great and have an [sic] super fun long weekend in FL!" Later in the day, Sullivan emails Donziger a link to a YouTube video titled "Expect to be a Millionaire" and writes, "It will help shift your mindset as you are out there raising capital for Ecuador." Donziger flies to Ottawa, Canada on Air Canada on May 25, 2017, and makes multiple purchases there until May 27, 2017. Donziger takes American Airlines from Ottawa to Jacksonville, Florida via Philadelphia, Pennsylvania.

Donziger emails Glenn Krevlin ("Krevlin") on May 28, 2017: "was just in canada... hope you are well and let me know if u want a brief update."

 [TD BANK 0000840-45; CITI-0001573; MKS-0011693-95; GKrevlin_0000228](#)

Apr. 2017

May 2017

○ May 3 - 9, 2017

 London, United Kingdom & Paris, France

On May 1, 2017, Donziger emails van Merkensteijn and Cliff Eisler "investor documents reflecting recent developments in Canada and the U.S." related to the Chevron litigation and writes, "on Tuesday, I am traveling for a week trying to generate interest in the propositions." Donziger takes British Airways to London on May 3. He meets with Stephen Weeks who suggests "that his sister Tacy also might be interested in the Ecuador case as an investment and he plans to introduce [Donziger] to her[.]" Donziger takes a train to Paris on May 5, 2017 and returns to London on May 7, 2017. On May 9, 2017, Donziger meets with Alan Harter and Ian Watson. Watson had earlier referred Harter to van Merkensteijn in a February 23, 2017 email calling him "a good friend." Donziger returns to New York on May 9, 2017. On May 15, 2017, he sends a thank you email to Harter, "with regard to the Ecuador opportunity, I am following up on your suggestion about the person in Texas."

 [TD BANK 0000842-49; JVM 002222-25; JVM 002830-31; JVM 003432; CE 015250-57; JVM 002495](#)

○ May 28 - 30, 2017

 Jacksonville, Florida

Donziger visits Fernandina Beach, Florida and stays at the Omni Amelia Island Plantation Resort. He returns to New York from Jacksonville, Florida airport on May 31, 2017. However, in an email exchange with Cliff Eisler, Donziger writes that he is "getting back today" on May 30, 2017.

 [TD BANK 0000840-45; CE 015355-57](#)

Travel Timeline for Steven Donziger

06.2017 - 07.2017



Travel Timeline for Steven Donziger

08.2017 - 08.2017

○ August 13, 2017

 Halifax, Nova Scotia, Canada

Donziger travels to Halifax, Nova Scotia, for what appears to be a day trip.

 [CITI-0001587-93;](#)
[TD BANK 0000830](#)

○ August 21 - 23, 2017


 Eureka & St. Louis, Missouri

Donziger purchases food at Culver's in Eureka, Missouri on August 21, 2017. In an email to Cliff Eisler on August 22, 2017, Donziger writes, "in St Louis with Matthew visiting my sister." He purchases a return flight from St. Louis, Missouri to New York, leaving on August 23, 2017, with Matthew Donziger.

 [CITI-0001590; TD BANK 0000830; CE 016016](#)

 Aug. 2017

○ August 17 - 19, 2017

 Salisbury, Connecticut

Donziger stays at the White Hart Inn in Salisbury, Connecticut.

 [TD BANK 0000830](#)

○ August 28 - 31, 2017

 Vancouver & Seattle, Washington

Donziger reports in an August 27, 2017 email to van Merkensteijn that he will be "leaving early in the morning" of August 28, 2017. He purchases a sea plane ticket on August 28, 2017, from Van City Seaplanes, likely to fly from Vancouver to Cortes Island and meet with Rex Weyler, and in-flight wi-fi access on the same date. He stops in Seattle on his return to New York.

 [JVM 001067-68.pdf; CITI-0001588-92; TD BANK 0000830](#)

Travel Timeline for Steven Donziger

09.2017 - 09.2017

○ September 1, 2017

 New Brunswick, New Jersey

Donziger visits New Brunswick, New Jersey and dines at Steakhouse 85.

 [CITI-0001576](#)


○ September 8, 2017

 Dallas, Texas

Donziger emails Cliff Eisler on Wednesday September 6, 2017, "Ben Barnes has summoned me to Dallas for Friday to meet a major lawyer who might jump in to our initiatives -- Ecuador and Donford."

 [CE 016073](#)

○ September 17 - 19, 2017

 London, United Kingdom

Donziger makes a purchase on September 17, 2019 at JFK Airport in New York. On September 19, 2017, Donziger withdraws funds from his TD Bank account at an ATM in Mayfair, London and makes one purchase on his Citi credit card at "SCOTTS" also in London.

 [TD BANK 0000753; CITI-0001594-96](#)

Sept. 2017

○ September 7, 2017

 London, United Kingdom

Donziger purchases a ticket to London on Norwegian Airlines on September 7, 2017. He purchases airport wi-fi internet access at London Gatwick Airport on the same date.

 [TD BANK 0000952](#)

○ September 11 - 14, 2017

 Ecuador

Donziger visits Ecuador and makes purchases in Quito on his TD Bank credit card. Katie Sullivan testified that she joined Donziger and a "delegation of Canadians" on this trip. While on the trip Donziger emails Cliff Eisler, "send the best and latest deck with me not downplayed. have new interest[.]" Separately, Donziger emails Cliff Eisler a memorandum reporting on the Canada delegation visiting Ecuador and writes, "ian [Watson] said he would put in 25k to fund the trip on the condition someone else put up the other 25k. we are offering a 10% premium to last round. let me know if you are interested. could use the help. have not asked anybody else other than JVM who said he couldn't[.]"

 [LEX1000052750_CRT.pdf; 2018.09.28 Mary K Sullivan Depo \(Rough\) at 89, 7-10.pdf; CE 016331; CE 016379-86; TD BANK 0000950-953](#)

○ September 23 - 28, 2017

 Ecuador

Donziger visits Ecuador. He joins Canadian indigenous leaders for a tour. Phil Fontaine, Ed John and Rex Weyler join him on this trip. He makes purchases on his Citi credit card in Miami, Florida and Quito, Ecuador.

 [LEX1000052750_CRT.pdf; Facebook.com; CE 016780-81; CITI-0001594-96](#)

Travel Timeline for Steven Donziger

10.2017 - 11.2017

○ October 9 - 11, 2017

 Toronto, Canada

Donziger arrives in Toronto on October 9, 2017, and returns to New York on October 11, 2017. He writes in an October 1, 2017 email that he wants to organize a dinner for Roger Waters on October 9, 2017, with Phil and Dean Fontaine, Ed John and Willie Littlechild among others. Donziger also proposes that the group consider attending Waters' concert in Ottawa on October 11, 2017. He forwards the email to Cliff Eisler and suggests that he join the trip to Toronto as well.

 [Twitter.com; CITI-0001598; TD BANK 0000947-48; CE 016407-08](#)

○ October 27 - 30, 2017

 Jacksonville, Florida

Donziger visits Jacksonville, Florida.

 [CITI-0001597-1601](#)

Oct. 2017

Nov. 2017

○ October 18, 2017

 Montreal, Canada

Donziger flies to Montreal.

 [CITI-0001598](#)

○ November 23 - 25, 2017

 Cambridge, Massachusetts

Donziger writes in an email that he planned to spend Thanksgiving in Cambridge, Massachusetts. He makes multiple purchases there on his TD Bank card between November 23-25, 2017. He stayed at the Charles Hotel.

 [MKS-0001949; TD BANK 0000942](#)

Travel Timeline for Steven Donziger

12.2017 - 12.2017


○ December 4 - 7, 2017

 Toronto & Ottawa, Canada

Sullivan writes in an email that Donziger “will be in Toronto so not certain of his flexibility” when trying to schedule a conference call. He also emails Glenn Krevlin that he will be “in Toronto tomorrow and then Ottawa.” Sullivan writes that Donziger is “presenting to the AFN (Assembly of First Nations) this afternoon.” The meeting was held in Ottawa, Canada. Donziger is identified in a tweet of the event in a photo with tribal chiefs.

Donziger flies from Toronto to Ottawa on December 5, 2017, and returns to New York on December 7, 2017. On December 6, 2017, he meets with Susan Smith and

Conor Mahoney. He emails them two days after their meeting and cc’s Kathleen Mahoney and Phil Fontaine, “let’s keep talking about a possible path forward, and timing, as we are preparing allocations for our next budget.” Donziger then describes “the ‘lane’ Bluesky could operate in[,]” which includes the “Canada-ization of the basic messaging” and “development of talking points explaining to the business and corporate sectors why enforcement of the Ecuador judgment would be good for Canada[.]” Donziger may have returned to Toronto on December 11, 2017.


 [MKS-000753-92; MKS-0002367-70; MKS-0000960-64; https://twitter.com/SDonziger/status/938959108362919936; CITI-0001605; CITI-0001608; TD BANK 0000936; MKS-0005896](#)

Dec. 2017


○ December 19 - 22, 2017

 Ecuador

Donziger visits Ecuador and makes multiple purchases in Quito.

 [LEX1000052750_CRT.pdf; CITI-0001607-12](#)

○ December 29, 2017 - January 6, 2018

 London, United Kingdom

Donziger writes in an email that he is leaving for one week and will be “largely out.” He makes a withdrawal from an ATM in London on December 30, 2017. He makes multiple purchases in London on his TD Bank card as well. His last purchase is on January 6, 2018.

Sullivan emails Donziger on January 5, 2018, regarding an investment from Krevlin in which she responds to Donziger, “enjoy your final days in London and brace yourselves for the cold!!!!”

 [MKS-0002188; TD BANK 0000769; TD BANK 0000928; MKS-0000957](#)

Travel Timeline for Steven Donziger

01.2018 - 03.2018

○ January 16, 2018



Donziger travels to Toronto for what appears to be one day. He may have arrived the night before. He dines at Little Anthony's. Donziger confirms the trip in an email to Katie Sullivan, Martin Garbus and Charles Nesson on January 16, 2018: "In Toronto today."

[TD BANK 0000929; MKS-0003234-34](#)

○ February 19 - 24, 2018



Donziger makes a purchase at Martini Bar at JFK airport on February 19, 2018. On February 20, 2018, Katie Sullivan emails John van Merkensteijn and Donziger, "I spoke with Steven yesterday morning and he was off to London last night." In response to a question from van Merkensteijn, Sullivan writes, "[Donziger] was going to be meeting with Belgian guy. Not certain of his return." Donziger withdraws funds from his TD Bank account at an ATM in Paris, France on February 21, 2018. His final purchase in Paris occurs on February 24, 2018. Donziger emails Cliff Eisler that he is in "Europe this week in [sic] fundraising tour[.]"

[TD BANK 0000773; TD BANK 0000923; CE 016867; MKS-0011556-57](#)

Jan. 2018

Feb. 2018

Mar. 2018

○ January 18 - 20, 2018



Donziger travels to San Francisco on JetBlue and makes multiple purchases there. His final purchase was on January 20, 2018.

[TD BANK 0000930](#)

○ March 5 - 6, 2018



Donziger makes a purchase in Charlton, Massachusetts, a town on the I-90 route to Boston on March 5, 2018. The next day, Donziger speaks to Harvard Law School Students at an event sponsored by the Environmental Law Society.

[March 5, 2018 Amazon Defense Coalition Press Release; TD BANK 0000862](#)

○ March 20 - 26, 2018



Donziger makes a purchase from a food vendor at JFK airport in New York on March 20, 2018. Donziger emails John van Merkensteijn on March 20, 2018, "i'm in morocco[.]" He stays at Le Petit Beur in Rabat, Morocco on March 20, 2018, and then travels to Meknes, Fes and Marrakesh. His last purchase is in Marrakesh on March 26, 2018.

[TD BANK 0000775-78; TD BANK 0000862-63; JVM 006914](#)


Travel Timeline for Steven Donziger

04.2018 - 05.2018


○ April 16 - 18, 2018

 Toronto, Canada

Donziger is in Toronto for a hearing at the Ontario Court of Appeal. Photographs posted to his Twitter profile indicate that he is in Toronto and meeting with indigenous groups.

 [Canada's First Nations join Amazon fight against Chevron - NOW Magazine; Twitter.com](#)

○ May 13 - 18, 2018

 London, United Kingdom; Paris, France; Brussels, Belgium

Donziger departs for London. He visits Brussels on May 15, 2018 or May 16, 2018 and later Paris on May 16, 2018 or May 17, 2018.

 [CITI-0001629-30; TD BANK 0000785; TD BANK 0000858](#)

○ May 27 - 30, 2018

 Cambridge, Massachusetts

Donziger stays at the Charles Hotel in Cambridge, Massachusetts.

 [CITI-0001637](#)

Apr. 2018

May 2018

○ May 4 - 7, 2018

 Calgary, Canada

Donziger visits Calgary, Canada and stays at the Hotel Le Germain.

 [CITI-0001628; TD BANK 0000858](#)

○ May 24, 2018

 Amagansett, New York

Donziger makes a purchase at Henry Lehr in Amagansett, New York.

 [TD BANK 0000858](#)

Travel Timeline for Steven Donziger

06.2018 - 06.2018

○ June 3, 2018

 Shelter Island, New York

Donziger makes a purchase at Vine Street Cafe in Shelter Island, New York.

 [TD BANK 0000858](#)

○ June 14 - 16, 2018

 Moscow, Russia

Donziger's Citi credit card statement includes a debit of \$5,481.16 on June 12, 2018 from TAP Portugal airlines for a ticket issued in his name that departs on June 14, 2018 from Lisbon to Domodedovo Airport in Moscow, Russia. There is a credit for the same amount issued the same day indicating this ticket was not purchased, purchased in error or refunded. Separately, the same statement includes a July 16, 2018 charge of \$6,062.82 from Aeroflot Russian Airlines. Also on July 16, 2018, Donziger was charged \$168.88 by Fasol Hostel in Moscow. The \$6,062.82 Aeroflot ticket charge was refunded to his Citi card on July 3, 2017 in two parts.

 [CITI-0001636-44; CITI-0001645-53](#)

Jun. 2018

○ June 5 - 6, 2018

 Toronto, Canada

Donziger travels to Toronto.

 [CITI-0001638](#)

○ June 18 - 20, 2018

 Montauk, New York

Donziger visits Montauk and stays at Gurney's Resort and Spa.

 [CITI-0001641](#)

○ June 28 - July 3, 2018

 Amagansett, New York

Donziger visits the Hamptons and stays at the White Sands Motel in Amagansett, New York.

 [CITI-0001643](#)

Travel Timeline for Steven Donziger

07.2018 - 08.2018

○ July 4 - 15, 2018

 London, United Kingdom & Mallorca, Spain

Donziger travels to Spain via London. He stays in London on July 5 – 6, 2018. He then travels to Mallorca with his wife where they stay at Cases de Son Barbassa Hotel. They return via London.

 [CITI-0001646-50](#)

○ August 3 - 5, 2018

 Amagansett, New York

Donziger returns to the Hamptons for two nights.

 [CITI-0001654-64](#)

Jul. 2018

Aug. 2018


○ July 22 - 27, 2018

 Cortes Island & Vancouver, Canada

Donziger writes in an email on July 26, 2018, that he is in Cortes Island, British Columbia, participating in a gathering of environmentalists at the Hollyhock conference center. His credit card records indicate that he visited Canada from July 22 – 27, 2018, and returned via Newark Airport.

 [GKrevlin_0000263; CITI-0001651-52](#)

○ August 17 - September 1, 2018

 London, United Kingdom; Cannes, France; San Sebastian, Spain

Donziger flies to London. He appears to leave London on August 22, 2018 for Cannes, France. He also visited Biarritz, Monaco and later San Sebastian, Spain.

 [CITI-0001654-64](#)

Travel Timeline for Steven Donziger


09.2018 - 11.2018

○ September 18 - 19, 2018

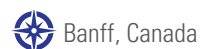


Ecuador

Donziger visits Ecuador. *El Universo* tweets a video of Donziger speaking on a panel in Spanish regarding the litigation. He is also interviewed by Ecuador TV.

 [Twitter.com; Twitter.com/video](#)
[Youtube.com; Youtube.com/video](#)

○ November 10 - 12, 2018



Banff, Canada

Donziger is due to speak in Banff, Alberta, Canada at the Indigenous Solutions for Environmental Challenges Conference on Day 1 (November 10, 2018, at 1pm local time) for a session called "A Lawyer's Experience: The history of the Aguinda litigation," moderated by Rex Weyler.

 [Indigenous Solutions for Environmental Challenges Conference](#)

Sept. 2018

Oct. 2018

Nov. 2018

○ October 17, 2018



Quito, Ecuador

Donziger visits Quito, Ecuador and addresses a conference at Universidad Andina Simon Bolivar during its Wednesday October 17, 2018 session.

 <https://twitter.com/SDonziger/status/1052609566880485377>;
[Facebook.com](#)

○ November 28, 2018



Monaco

Donziger is expected to speak at the Day One Event conference in Monaco.

 [Twitter.com](#)



Location



Hyperlink

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